DC Office of the State Superintendent of Education

January 22, 2010

Gene Wilhoit, Executive Director
Council of Chief State School Officers
One Massachusetts Avenue, NW, Suite 700
Washington, DC 20001-1431

Dear Gene,

We have reviewed the draft English Language Arts (ELA) and Mathematics K-12 Common Core State Standards and exemplars and appreciate the opportunity to provide feedback. We are impressed by the conscientious approach the Council of Chief State School Officers (CCSSO) and National Governors Association (NGA) are taking toward revisions and additions, especially under such tight timelines, and see this latest document as a strong move toward a solid final draft. We are especially pleased with the new hierarchical organization of the standards with core skills readily accessible for teachers and the addition of Literacy Standards for History and Science.

Attached you will find our responses to the questions sent out with this draft. In it you will find three main areas of concern:

- There is still a vast amount of information that states will have to re-organize. As part of our review, we were privileged to confer with Dr. Norman Webb, who suggested taking a utilitarian approach to re-organization – the creation of a two-document system. One document satisfies accountability requirements and a second serves teaching and learning needs.

- The use of grade bands in ELA for 4 – 5, 6 – 8, 9 – 10, and 11 – College and Career Readiness (CCR) will necessitate the delineation of standards for each grade level for assessment purposes, which may be a cumbersome process. We hope this can be addressed in the next draft, especially at the elementary level.

- As we have stated before, our biggest challenge will be mounting the necessary investment in quality professional development, especially for teaching reading in content areas. While we applaud the addition of the Literacy Standards for History and

Science, content area teachers will definitely need instruction and support in effective strategies for teaching reading in content areas in order to meet the new standards.

These standards represent a step in the right direction for education reform, and I thank you for your commitment to this initiative. Students across the country and particularly students in the District of Columbia will benefit from the clearer and higher standards.

We look forward to the release of the public draft of the standards and to beginning the hard work of adoption and implementation. If you have any questions or concerns, please contact Cathie Carothers, Assistant Superintendent of Elementary and Secondary Education, at cathie.carothers@dc.gov.

Sincerely,

Kerri L. Briggs, Ph.D.
State Superintendent of Education

cc: Mayor Adrian Fenty
Deputy Mayor Reinoso
Ted Trabue

Enclosure

OSSE response to CCSSO K-12 English Language Arts and Mathematics Common Core State Standards Drafts (January 13, 2010)

1. Is the architecture of the draft standards clear and easy to follow for all audiences (e.g., teachers, administrators, curriculum developers, students, general public)?

ELA: The architecture of the draft standards is greatly improved over the first draft of K–8 standards. The alignment of the core skills to the core standards and then to text type indicators make the document much clearer for planning instruction and assessment. The document could be improved, however, by making it less cumbersome. States will also need to reconfigure the document to make it more user friendly for all constituents.

The addition of the Language Development Standards adds greatly to the document and presents a clear progression across grades easy for all audiences to understand and implement.

Math: The architecture of the draft standards in mathematics for K-8 is clear and easy to follow. The "students understand that" sections will permit teachers to develop formative or interim assessments to ensure that coherent understanding of the embedded learning progressions is being achieved. Teachers will have to be trained in using this language to created targeted formative or interim assessments.

We do not believe that the architecture for High School, College and Career Readiness Standards in Mathematics is readily accessible. This will require states to decide how to group these skills and articulate them in an appropriate course sequence. This allows the flexibility of using a traditional, integrated, or otherwise articulated sequence. We hope that CCSSO will offer guidance in the appropriate course-level articulation of these standards to support the integrity of the adoption process.

2. Does the document present a rigorous, yet reasonable continuum of expectations for student learning in each discipline?

ELA: Yes. In this regard, the document is exemplary. There is a clear distinction between grade bands and grade levels. While rigorous, the continuum of expectations is strongly back-mapped from the College and Career Readiness standards to lead to student success. The continuum of expectations for students can be defined through the illustrative texts specifying what students should be reading and student writing examples by which teachers can gauge the expected quality of writing at each grade level. Where various grade-level bands are addressed, the "Focus for Instruction" for each grade delineates the necessary skills and will be a valuable tool.

Math: For the K-8 ,standards the document presents a rigorous, yet reasonable continuum of expectations for student learning in Mathematics. The high school standards also appear to be rigorous, yet reasonable, though that will in part depend upon who the standards are actually unpacked and aligned to courses.

3. Is the language in this draft clear, concise, and precise? Will teachers be able to readily identify the standards within the document?

ELA: The language is clear, concise, and consistent when discussing concepts and text descriptions, but some teachers will need professional development to understand and teach the technical language in the phonics piece. The precise benchmarks listed in the Language Development section will give educators clear goals for each grade level since they are broken down in more specific objectives to guide instruction as well as giving the classroom teacher a tool to understand language acquisition. This will allow instruction to follow a cohesive, meaningful progression.

Math: The language is clear, concise, and precise but many teachers will not be able to identify the standards without additional guidance.

4. One of our stated goals for the common core state standards is that they are fewer, clearer and higher. Do these standards meet those criteria? Please be specific in areas where we can be more concise.

ELA: While all the information in the documents is valuable, it seems the goal of fewer has been lost in the vast amount of information. States must decide what is most helpful for the various levels they serve – LEAs, schools, educators. The standards and supporting documents will have to be packaged in such a way as to be user-friendly for all audiences.

The "clearer and higher" goals have been successfully met and will provide the framework needed for education reform in preparing students to be ready for college and the workforce.

Math: Generally, the mathematics standards do appear to meet the goal of fewer, clearer, and higher. However, the adjustment that will come with unpacking the High School, College and Career Readiness Standards in Mathematics into course may impact this judgment.

5. Please provide any other general feedback about the draft standards.

ELA: The Literacy standards for History and Science are a tremendous asset to states in their efforts to improve literacy. They will, however, raise the question of teacher certification to ensure all educators are capable of being effective reading teachers. States will need strong policies in place to support this move with high quality professional development available to teachers to successfully implement the entire common core package.

Also, explaining the access for English language learners and students with disabilities will help states to meet the needs of these populations while maintaining the rigor in the document. The standards are well written; we appreciate the additional formulae to define text complexity and provided exemplars. The working group covered all necessary topics to produce a sound, valuable document. OSSE applauds your work and is eager to begin moving implementation forward.

Math: We have several corrections and other suggestions for your consideration. The concept of even and odd numbers is not explicitly addressed and should be addressed, preferably by the end of first grade. In addition:

Page 8 Mathematics: Kindergarten

Early Relations and Operations

3. Change "how much more than 9 is 5" to "how much more than 5 is 9"

Page 11 Mathematics: First Grade

Quantity and Measurement

Core Standards- Students can and do

a. Rewrite "Using an object as a length unit, measure, compare and estimate length" as "Measure, compare and estimate length using an object as a unit length" to maintain a parallel structure across the document.

Similarly rewrite b.

Page 17 Under the "Students understand that" section the relational aspect of multiplication to other arithmetic operations is emphasize. Under "Students can and do" part c, "relational families" rather than "fact families" would be a more consistent term for developing the idea that additional "relational families" can be derived and do not need to be memorized as the term fact may suggest.

Page 19 Benchmark decimals and fractions should be spelled out in the body of the document not assumed to be understood.

Page 21 Under the "Students understand that" section 3 where it says "the measure of an angle is the number of one-degree angle turned with no gaps or overlaps." Either use "one-degree angle turns" or "one-degree angles turned."

Page 23 Under "Base Ten Computation" for "Students can and do" part b; this would be more appropriate under the "Students understand that" section.

Page 25 "Typical deviation" is not a well defined term and could lead to confusion among teachers. Either the term should be defined or another well-defined term should be substituted.